



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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217/785-8410

7002 3150 0000 1252 9614

March 4, 2005

Leslie S. Pinsof  
SiPi Metals Corporation  
1720 N. Elston Avenue  
Chicago, IL 60622

Refer to: 0316005887 - Cook County  
Chicago/SiPi Metals Corporation  
Site Remediation Program/Technical

RELEASABLE

MAR 14 2005

Dear Mr. Pinsof:

REVIEWER MD

The Illinois Environmental Protection Agency (Illinois EPA) has completed review of the *Comprehensive Site Investigation and Remedial Objectives Report* (dated November 29, 2004). The report, prepared by Clayton Group Services for the SiPi Metals Corporation, was received by the Illinois EPA on December 2, 2004. The Illinois EPA disapproves the report. Please address the comments below.

- 1) The vertical extent of contamination has not been defined. Numerous soil boring locations have contamination above Tier 1 Soil Remediation Objectives (SROs) but have no further vertical delineation samples to indicate the depth of contamination. This extent needs to be further defined. The Illinois EPA requests a work plan that would address this delineation.
- 2) The soil component of the migration to groundwater pathway has not been eliminated properly through 35 Illinois Administrative Code 742.320. All contaminant exceedances of this pathway need to be modeled to predict any future groundwater contamination, and if so, the extent of groundwater contamination. Lead can be modeled for this demonstration and the Illinois EPA now has  $K_d$  values for lead that are dependent upon the soil pH, they are as follows: soil pH of 4.0-6.3  $K_d$  value is 150, soil pH of 6.4-8.7  $K_d$  value is 710, soil pH of 8.8-11  $K_d$  value is 1880. These input values should give more realistic lead values in the equation.

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- 3) When analyzing soil samples for  $f_{oc}$  analysis, Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs) and pesticides need to be analyzed to determine if the sample is a clean sample. The Illinois EPA prefers the use of USEPA Method 9060A. If the ASTM D2974-87 will be used for  $f_{oc}$  analysis, a conversion factor needs to be applied to the result of this analysis for an accurate organic carbon measurement.

If you have any questions, you can reach me at the telephone number or address listed above or at [Tammy.Smith@epa.stae.il.us](mailto:Tammy.Smith@epa.stae.il.us)

Sincerely,



Tammy S. Smith  
Voluntary Site Remediation Unit  
Remedial Project Management Section  
Division of Remediation Management  
Bureau of Land

cc: Russell Chadwick  
Clayton Group Services  
3140 Finley Road  
Downers Grove, IL 60515

bcc: Bureau of Land File

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Leslie S. Pinsof SiPi Metals Corporation 1720 N. Elston Avenue Chicago, IL 60622	
PS Form 3800, June 2002	

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